

A primary purpose of the Amateur Radio Service is to "supply a reservoir of trained operators".

The FCC still requires Commercial paging and other transmitters to identify in CW so that "Intermod" and transmissions from malfunctioning unattended transmitters can be identified and diagnosed. This has proven inexpensive and effective.

Dropping the requirement for a class of amateur license to be able to copy the CW identification will require that the FCC devise and require universal implementation of a replacement "Foolproof" method to identify a malfunctioning unattended transmitter.

The financial burden on the owners of the thousands of transmitters now being identified with the simple CW method will be significant.

I therefore submit that it is in the national interest to either reinstate the commercial telegraph license operator requirement for all commercial radio companies servicing transmitters using a CW identifier, or maintain the CW requirement for the "top" class of Amateur license at a speed equal to or above the highest legal CW identifier speed.

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